COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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IN REPLY PLEASE
REFER TO FILE: EP-2

May 12, 2003

TO: Each Supervisor

FROM: James A. Noyes
Director of Public Works

BOARD MOTION OF APRIL 15, 2003, SYNOPSIS 69-B
POTENTIAL GROUNDWATER CONTAMINATION
UNDER THE SUNSHINE CANYON LANDFILL–COUNTY EXTENSION

On April 15, 2003, the Board of Supervisors instructed Public Works to review a recent report prepared by the California Regional Water Quality Control Board which raised concerns over potential groundwater contamination under Sunshine Canyon Landfill and report back to the Board within 30 days with our findings.

On March 27 and April 11, 2003, the Regional Water Board, Los Angeles Region, issued letters to Browning-Ferris Industries (BFI), Inc., regarding potential groundwater contamination at the County Extension landfill (copies attached). The letters are in response to an application submitted by BFI to the Regional Water Board and the County of Los Angeles Department of Health Services for revised permits from both agencies. The permit requests are related to a 42-acre expansion of the County Extension landfill which was envisioned in the County-approved Conditional Use Permit as a part of a combined landfill extending into the City of Los Angeles. The overriding concern expressed in both letters from the Regional Water Board is the consistent detection in the Landfill‘s subdrain system of volatile organic compounds that are normally associated with landfill gas.

The following is a brief synopsis of our findings.

Summary of Findings

The Regional Water Board’s letters express concern over the continued presence of landfill gases in the subdrain underneath the liner system although they indicate that the

concentrations of contaminants in the subdrain water have been "generally lower" than the maximum levels allowed for drinking water. However, the Regional Water Board considers the continued presence of such constituents a "measurable significant" evidence of release (as defined in State regulations) and have directed BFI to develop a program to more accurately determine the nature and extent of the release and, based on the results, implement any necessary corrective measures.

In a response dated April 22, 2003 (copy attached) to the Regional Water Board's letters, BFI acknowledged the Regional Water Board's finding and has agreed to comply with the Regional Water Board's requirements. BFI further stated they believe the source of the VOCs in the subdrain is related to landfill gas. However, BFI noted that the subdrain is not a monitoring point pursuant to the permit issued by the agency and that no VOC-impacted subdrain water is being discharged to surface water or groundwater on-site.

Impact on Groundwater

The technical report submitted by BFI to both agencies (as a part of the permit applications) does not contain any information or evidence showing that groundwater beneath the County Extension landfill has been contaminated by the VOCs detected in the subdrain water.

Interim Mitigation Measures

BFI currently monitors the subdrain water for presence of VOCs on a monthly basis and other constituents of concern on a quarterly basis. The data is submitted to the Regional Water Board with their regular groundwater monitoring reports.

Since the initial detection of the VOCs in the subdrain system, BFI has diverted water from the subdrain to a temporary storage tank at its on-site leachate treatment facility. This water is then reused at the landfill for dust control at the site as allowed by the current permit from the Regional Water Board. No subdrain water is currently being discharged to surface water or groundwater on-site. Additionally, BFI is actively removing landfill gas from the subdrain system by pumping the gas out. The gas is collected and flared at the site.

To control landfill gas, gas collection wells were constructed in the refuse. These wells form a system that removes gas from the landfill mass and reduces the internal gas pressure of the landfill. BFI is currently expanding and enhancing the landfill gas collection system by installing 8 new wells with an additional 23 wells planned over the

next three months. The new wells will further reduce the internal gas pressure of the landfill and keep the landfill gas from migrating to the gravel layers where the subdrain system resides.

Conclusion

There is no apparent disagreement between the Regional Water Board and BFI that the source of the VOCs in the subdrain water is landfill gas and that the levels of VOCs in that subdrain water appear to be generally within the maximum allowed for drinking water. There is no evidence at this time that any groundwater, on-site or off-site, or surface water are being impacted.

It also appears that the measures being implemented by the Regional Water Board and BFI are appropriate to ensure the protection of surface and groundwater quality in the interim and in the long term. Upon the completion of the evaluation program mandated by the Regional Water Board, we will provide your Board with an update of their findings.

If you have any questions regarding this report, please contact me, or your staff may contact Don Wolfe, Assistant Director, at (626) 458-4014, or Shari Afshari, Assistant Deputy Director, at (626) 458-3500.

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Attach.

cc: Chief Administrative Office
County Counsel
Executive Office
Department of Health Services